

‘wherein the first characteristic’.” The Examiner is correct and the applicant is amending these claims to add the language suggested by the Examiner.

In view of the changes made to claims 13, 14, 17 18 and 20 these claims are now believed to be allowable in these regards. Claim 21 already refers to “first characteristics include color patterns at specific locations on the documents.” so is believed to be allowable in this regard.

Next, the Examiner rejects claims 1 - 32 “under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,992,601 to Mennie et al. (‘Mennie’).” Referring to claims 1, 6 and 31 the Examiner then states that: “Mennie discloses a method for identifying and verifying documents to determine if they are genuine, counterfeit or altered” and cites column 2, lines 47 – 50 in that patent. The applicants do this but not as suggested or taught by the Mennie patent. The applicants respectfully disagree with the Examiner for the following reasons.

The Examiner refers to the first step in Applicant’s claim 1 and refers to (column 2, lines 52-60) in the Mennie patent. At that location we read:

“A plurality of characteristic information is utilized in various combinations to discriminate and/or authenticate bills. For example, a method comprises the steps of *retrieving first and second characteristic information* from a currency bill and denominating the currency bill a first time as belonging to one of a plurality of recognizable denominations using the first characteristic information. This is accomplished by comparing the retrieved first characteristic information to master first characteristic information associated with each of the plurality of recognizable denominations. *Then the currency bill is authenticated by comparing the retrieved second characteristic information* to master second characteristic information associated only with the denomination

determined by the first denominating step. (***bolding and italicizing emphasis added***)

Thus, all the first and the second characteristic information is retrieved before any analyzation begins to denominate and then authenticate a currency bill, and the comparison involves comparing the second characteristic information retrieved from a currency bill to that portion of the retrieved master second characteristic information.

The applicants do not do this. Size of a document under analysis is first measured and, only thereafter, second characteristic information regarding only documents that match the measured size is retrieved from storage for the second step of testing. All second characteristic information is not retrieved as in Mennie. This is clear when reading the applicant's Summary of the Invention where we read in part:

“The first step in the process uses an image of the presented document to determine the physical size of the document. All documents that may be processed are classified into a plurality of physical size ranges. Upon determining the size of the document from the first image the document type is thereby narrowed down to a smaller set of documents. To further narrow the search the presence of information at specific locations, i.e. test regions, on the document is looked for. For example, the presence of a certain pattern of colors in the test regions is looked for.” (p. 4, l. 14 – 20) (***underlining added***)

“In the second step, using the identified document type, reference information for the document are retrieved. This criterion includes document layout, security features and intrinsic characteristics (documetric) for the identified document type. Using the reference information, data and images are collected from test regions on the document.” (p.5, l. 6-9) (***underlining added***)

In applicant's claim 1 we read in part:

“determining a first characteristic of a first document to be verified, the first characteristic being common to a first group of documents that is less than all documents;”

“retrieving a set of second characteristics for the first group of documents, where individual documents in the first group of documents have ones of the second characteristics;”

From the language of claim 1 it is clear that the second characteristics cannot be retrieved until first group of documents has been determined. It is clear from this language that a limited group of second characteristics are retrieved – only those for “the first group of documents” that have the first characteristic. Thus, it is respectfully contended that applicant's claim 1 is not anticipated by the Mennie patent under 35 U.S.C. 102(b), and claim 1 is allowable in this regard.

There are similar restrictions in all of applicant's independent claims 6, 11, 15, 19, 22, 25, 28, 31 and 32 so they are also believed not to be anticipated by the Mennie patent under 35 U.S.C. 102(b). These claims are mentioned below.

The applicant does not address the Examiner's other comments regarding claim 1 in light of the distinctions made above from which it is believed that claim 1 is allowable as written.

Turning to applicants claims 2 and 7, the Examiner states that: “Mennie discloses the method in accordance with claim 1 further comprising the step of providing an indication that the first document is genuine, counterfeit, or altered based upon the results of the reference information comparing step (column 2, lines 64-67, Fig. 11 elements 108, 114 and 124).” While Mennie does provide an indication as to the authenticity of a currency bill, claim 2 is nevertheless believed to allowable based on its dependency from claim 1 which is believed to be allowable as described above. Similarly, claim 7 is nevertheless believed to

allowable based on its dependency from claim 6 which is believed to be allowable as described above.

With reference to claims 3 and 8, the Examiner states that: "Mennie discloses the method in accordance with claims 1, wherein the first characteristic is the size of the first document, all documents are divided into size ranges and the first group of documents are those documents within one of the size ranges (Fig. 11 a, elements 106 and 116), and the second characteristics are found at specific locations on individual documents of the first group of documents (Fig. 11b, element 122)." While Mennie teaches using size to denominate currency bills, claim 3 is nevertheless believed to allowable based on its dependency from claim 1 which is believed to be allowable as described above. Similarly, claim 8 is nevertheless believed to allowable based on its dependency from claim 6 which is believed to be allowable as described above.

The Examiner rejects claims 4 and 9 stating that: "Mennie discloses the method in accordance with claims 3, wherein the second characteristics include color patterns at specific locations on the documents (column 21, lines 43-50)." While Mennie teaches using color to denominate and authenticate currency bills, claim 4 is nevertheless believed to allowable based on its dependency from claim 1 which is believed to be allowable as described above. Similarly, claim 9 is nevertheless believed to allowable based on its dependency from claim 6 which is believed to be allowable as described above.

Next the Examiner rejects claims 5 and 10 stating that: "Mennie discloses the method in accordance with claim 1, further comprising the steps of: Keeping track of each type of document identified in the first group of documents (Fig. 11 a, element 116);" While element 116 in Fig. 11a Mennie does keep track of each type of document identified, claim 5 is nevertheless believed to allowable based on its dependency from claim 1 which is believed to be allowable as described above. Similarly, claim 10 is nevertheless believed to allowable based on its dependency from claim 6 which is believed to be allowable as described above.

With reference to claims 11 and 15 the Examiner states that: "Mennie discloses a method for identifying and verifying documents to determine if they are genuine, counterfeit or altered (column 2, lines 47-50, wherein currency bills corresponds to documents and authenticating corresponds to genuine, counterfeit or altered)," the method comprising the enumerated steps. The applicants respectfully disagree with the Examiner. Claims 11 and 15 are independent claims that have the same differences from the teaching of the Mennie patent that are described in detail above with reference to claim 1. Thus, claims 11 and 15 are believed not to be anticipated by the Mennie patent under 35 U.S.C. 102(b).

The Examiner then rejects claims 12 and 16 stating that: "Mennie discloses the method in accordance with claim 11" and refers to the steps in claim 11. The applicants respectfully disagree with the Examiner. The elements 120 and 122 in Figure 11b teach scanning a bill for a characteristic pattern and then comparing that pattern to master patterns of genuine bills. This is not what the applicant is claiming in claims 12 and 16. The applicant's do not perform this comparison in a random manner. Rather, characteristics for "the most commonly identified type of document" are first chosen for the comparison with the scanned pattern. This is described in the applicant's specification starting at page 12, line 38. Statistically this reduces the comparison time. This feature is not suggest or taught anywhere in the cited Mennie patent or any of the prior art cited by the Examiner. → 29.13

In addition, claim 12 is nevertheless believed to allowable based on its dependency from claim 11 which is believed to be allowable as described above, and claim 16 is nevertheless believed to allowable based on its dependency from claim 15 which is believed to be allowable as described above. ✓

Claims 13 and 17 are rejected by the Examiner stating that: "Mennie discloses the method in accordance with claim 12 further comprising the step of providing an indication that the first document is genuine, counterfeit or altered based upon the results of the reference information comparing step (column 2, lines 64-67, Fig. 11 elements 108, 114 and 124)." This is true, nevertheless claim 13 is believed to allowable based on its dependency from claim 11 which is believed to be allowable as described above with reference to claim ✓

1. Similarly, claim 17 is believed to allowable based on its dependency from claim 15 which is believed to be allowable as described above with reference to claim 1.

Claims 14 and 18 are rejected by the Examiner stating that: "Mennie discloses the method in accordance with claim 13 wherein the first characteristics include color patterns at specific locations on the documents." This is true, nevertheless claim 14 is believed to allowable based on its dependency from claim 11 which is believed to be allowable as described above with reference to claim 1. Similarly, claim 18 is believed to allowable based on its dependency from claim 15 which is believed to be allowable as described above with reference to claim 1. ✓

The Examiner then rejects claims 19, 22, 25, 28 and 32 stating that these claims are "rejected for the same reasons indicated above for rejections made to claims 11 and 12." These claims are all independent claims having the same restriction described above with reference to claim 1 that is not suggested or taught in the Mennie patent so these claims are likewise believed to be allowable. 1

Next the Examiner rejects claims 20, 23, 26 and 29 "for the same reasons indicated above for rejections made to claim 13." As described above, claims 13 is believed to be allowable based on its dependency from claim 11 which is believed to be allowable as described above with reference to claim 1. Similarly, claims 20, 23, 26 and 29 are believed to be allowable based on their dependency from ones of independent claims 19, 22, 25, 28 and 32 which are all believed to be allowable because they have the same restrictions as claim 1 that is not taught or suggested in the Mennie patent. ✓

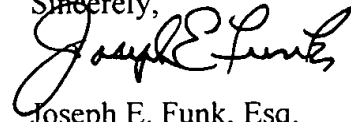
Finally, the Examiner states that claims 21, 24, 27 and 30 are "rejected for the same reasons indicated above for rejections made to claim 14." As described above, claims 14 is believed to be allowable based on its dependency from claim 13 which is believed to be allowable as described above with reference to claim 1. Similarly, claims 21, 24, 27 and 30 are believed to be allowable based on their dependency from ones of independent claims 19, ✓

22, 25, 28 and 32 which are all believed to be allowable because they have the same restrictions as claim 1 that is not taught or suggested in the Mennie patent.

The Examiner then cites U.S. Patents 6,269,169; 6,237,739; 6,343,204; and 6,297,885 as being "made of record and not relied upon is considered pertinent to applicant's disclosure." The applicants have reviewed these patents and do not believe that they suggest or teach the applicant's invention either individually or in combination with others of the cited patents.

In view of the above arguments and the amendments to the claims, this patent application is now believed to be in condition for allowance and passage to issuance is respectfully requested. If there remain any matters that may be resolved by telephone the Examiner is invited and authorized to contact the undersigned attorney via telephone at (603) 432-8788, via fax at (603) 421-2779, or via e-mail at jfunk@tiac.net.

Sincerely,



Joseph E. Funk, Esq.
Reg. No. 25,974
Attorney for Applicant